

## Message Text

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PAGE 01 STATE 187355  
ORIGIN TRSY-04

INFO OCT-01 EUR-12 ISO-00 L-03 /020 R

TX-387

DRAFTED BY TREASURY:XAA:MFIELD:IMW  
APPROVED BY STATE:L/T:AROVINE  
TREASURY:XLI:HDROSENBLOOM  
EUR/WE:MCRAMERUS  
-----051390 252042Z /23  
R 251824Z JUL 78  
FM SECSTATE WASHDC  
TO AMEMBASSY PARIS

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E.O. 11652: NA

TAGS:EFIN

SUBJECT:

FOR: FRANK BARNDT, IRS

1. PLEASE PROPOSE TO MR. DONNADIEU OR MR. KERLAN THE FOLLOWING ADDITIONAL CHANGES IN FRENCH LANGUAGE TEXT OF PROPOSED ESTATE AND GIFT TAX TREATY AND IN NOTE TO ACCOMPANY PROTOCOL TO INCOME TAX TREATY. PLEASE INQUIRE WHEN THEY EXPECT FINAL FRENCH TEXT TO BE READY FOR SIGNATURE. WE ARE RECEIVING FREQUENT INQUIRIES AND WOULD  
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LIKE TO SCHEDULE SIGNING ASAP.

2. PROPOSED CHANGES IN FRENCH TEXT OF ESTATE AND GIFT TAX TREATY.

A. IN ARTICLE 1, PARAGRAPH 1, LINE 4, CHANGE "DE LEUR DOMICILE..." TO "TO "DU DOMICILE DE CES PERSONNES..." TO BETTER CONFORM TO ENGLISH TEXT.

B. IN ARTICLE 1, PARAGRAPH 2, LINES 4 AND 5, CHANGE "LES EFFECTUENT" TO "SONT EFFECTUEES" AND CHANGE "DE LEUR DOMICILE" TO "DU DOMICILE DE CES PERSONNES".

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C. IN ARTICLE 2 (1) (B) CHANGE "DROITS" TO "IMPOTS".  
THE TITLE OF THE CONVENTION REFERS TO "IMPOTS" AND  
ARTICLE 3 (1) (E) DEFINES "IMPOT" IN TERMS OF THE "IMPOTS"  
MENTIONED IN ARTICLE 2.

3. THE SIGNATURE BLOCK ON THE COVER PAGE OF THE PROTOCOL  
SHOULD BE DELETED IN THE FINAL VERSION AS IT WILL BE  
SIGNED ON THE LAST PAGE.

4. PROPOSED MODIFICATION TO THE EXCHANGE OF NOTES  
ACCOMPANYING THE PROTOCOL: ON PAGE 2, POINT 2, THE  
SECOND PARAGRAPH WOULD BE REVISED TO READ:

"IT IS UNDERSTOOD THAT THE SENATE OF THE UNITED STATES  
HAS NOT CONSENTED TO ANY LIMITATION ON THE TAXING  
JURISDICTION OF THE STATES BY TREATY, AND THAT A  
PROVISION WHICH WOULD HAVE RESTRICTED THE USE OF UNITARY  
APPORTIONMENT IN THE CASE OF A U KINGDOM  
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CORPORATION NOT CONTROLLED BY U.S. SHAREHOLDERS AND  
ITS U.S. SUBSIDIARIES WAS RECENTLY RESERVED ON BY THE  
SENATE. THE GOVERNMENT OF FRANCE CONTINUES TO BE CONCERNED  
ABOUT THIS AS IT AFFECTS FRENCH MULTINATIONALS. IF AN  
ACCEPTABLE PROVISION ON THIS SUBJECT CAN BE DEVISED, THE  
UNITED STATES AGREES TO REOPEN DISCUSSIONS WITH FRANCE  
ON THIS MATTER.

5. WE WOULD LIKE TO TRANSMIT TEXTS TO THE SENATE IN  
EARLY SEPTEMBER AFTER ITS LATE AUGUST RECESS. TO  
COMPLETE THE NECESSARY STEPS IN TIME, SIGNING SHOULD TAKE  
PLACE BEFORE MID-AUGUST . PLEASE ASK MR. DONNADIEU IF  
THAT TIMING SEEMS FEASIBLE ON THEIR SIDE. VANCE

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NNN

## Message Attributes

**Automatic Decaptioning:** X  
**Capture Date:** 01 jan 1994  
**Channel Indicators:** n/a  
**Current Classification:** UNCLASSIFIED  
**Concepts:** AGREEMENT DRAFT, TAX AGREEMENTS, AMENDMENTS  
**Control Number:** n/a  
**Copy:** SINGLE  
**Draft Date:** 25 jul 1978  
**Decaption Date:** 01 jan 1960  
**Decaption Note:**  
**Disposition Action:** RELEASED  
**Disposition Approved on Date:**  
**Disposition Case Number:** n/a  
**Disposition Comment:** 25 YEAR REVIEW  
**Disposition Date:** 20 Mar 2014  
**Disposition Event:**  
**Disposition History:** n/a  
**Disposition Reason:**  
**Disposition Remarks:**  
**Document Number:** 1978STATE187355  
**Document Source:** CORE  
**Document Unique ID:** 00  
**Drafter:** XAA:MFIELD:IMW  
**Enclosure:** n/a  
**Executive Order:** N/A  
**Errors:** n/a  
**Expiration:**  
**Film Number:** D780305-0468  
**Format:** TEL  
**From:** STATE  
**Handling Restrictions:** n/a  
**Image Path:**  
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**Legacy Key:** link1978/newtext/t19780722/aaaaasoy.tel  
**Line Count:** 105  
**Litigation Code IDs:**  
**Litigation Codes:**  
**Litigation History:**  
**Locator:** TEXT ON-LINE, ON MICROFILM  
**Message ID:** dc13e76c-c288-dd11-92da-001cc4696bcc  
**Office:** ORIGIN TRSY  
**Original Classification:** LIMITED OFFICIAL USE  
**Original Handling Restrictions:** n/a  
**Original Previous Classification:** n/a  
**Original Previous Handling Restrictions:** n/a  
**Page Count:** 2  
**Previous Channel Indicators:** n/a  
**Previous Classification:** LIMITED OFFICIAL USE  
**Previous Handling Restrictions:** n/a  
**Reference:** n/a  
**Retention:** 0  
**Review Action:** RELEASED, APPROVED  
**Review Content Flags:**  
**Review Date:** 05 may 2005  
**Review Event:**  
**Review Exemptions:** n/a  
**Review Media Identifier:**  
**Review Release Date:** N/A  
**Review Release Event:** n/a  
**Review Transfer Date:**  
**Review Withdrawn Fields:** n/a  
**SAS ID:** 1892667  
**Secure:** OPEN  
**Status:** <DBA CHANGED> VJT 20041027  
**Subject:** PROPOSED CHANGES IN FRENCH TEXT OF ESTATE AND GIFT TAX TREATY  
**TAGS:** EFIN, US, FR  
**To:** PARIS  
**Type:** TE  
**vdkgvwkey:** odb://SAS/SAS.dbo.SAS\_Docs/dc13e76c-c288-dd11-92da-001cc4696bcc  
**Review Markings:**  
Sheryl P. Walter  
Declassified/Released  
US Department of State  
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20 Mar 2014  
**Markings:** Sheryl P. Walter Declassified/Released US Department of State EO Systematic Review 20 Mar 2014